Remarks

Claims 44-86 are now pending in this application. Claims 44-86 are rejected. No new matter has been added. It is respectfully submitted that the pending claims define allowable subject matter.

Claims 45 and 46 have been rejected under 35 U.S.C. § 112, second paragraph as being indefinite. As suggested in the Office Action and to correct a typographical error, Applicants have amended claim 45 to depend on claim 44 instead of claim 46. Accordingly, Applicants submit that the rejection under 35 U.S.C. § 112, second paragraph has been overcome and should be withdrawn.

Claims 44-50, 53-55, 56-57, 59, 65-71, 74-76, 77-82 and 85-86 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anthony et al. (U.S. Patent 6,559,769) in view of Piccioni (U.S. Patent 6,842,774). Applicants respectfully traverse the 35 U.S.C. § 103(a) rejection.

Anthony et al. describes an early warning real-time security system including a local controller apparatus 5 for capturing audio and/or video signals 20 via a plurality of cameras 10 and then uploading these signals in real-time to satellite 30. After being uploaded to satellite 30 via an input stream 20, the corresponding audio video signals are then transmitted via a download stream 25 to a monitoring station or home base 35. The monitoring apparatus 5 comprises activation means 15 to trigger continuous real-time monitoring, uplinking-and-downlinking, and recording, on a manually-activated basis. Continuous real-time monitoring, uplinking-and-downlinking, and recording on an automatic basis or on a periodic basis depending upon the nature of an anticipated or expected series of activities or the like also may be provided (column 5, lines 7-23). The activation, creating digital audio and visual signals, uplinking, downlinking, recording, analysis, and remedial measures, may be assigned preset

schedules providing a "hot link" between a locally implemented controller apparatus and a plurality of remote receivers that record and monitor activities and events based upon a sequence of audio video signals and control signals received in real-time. The system may provide transmission of audio visual and control signals by dialing up predetermined phone or Internet (or intranet or extranet) numbers via cell phone or other wireless telecommunications and/or transmission of audio visual signals by beaming up to satellite or GPRS or the like, to access special broadband networks over designated frequencies or the like. The system can even call designated pagers by transmitting digital video and audio signals with GPS data. PDA devices such as embodiments of the Palm Connected Organizer and the RIM Blackberry devices may be used for sending and/or receiving information (column 8, lines 37-59).

In general, the system may be implemented using a home-base personal computer, comprising a desktop, a notebook, a sub-notebook, or a PDA, as well as from a sophisticated regional control center. In one embodiment, the early-warning security system 2 includes a mobile unit 5 having an integrated circuit board 350 with a built-in CPU with concomitant architecture suited to accommodate embedded and multimedia processing. A plurality of remote, mobile units may continuously "talk-to" a plurality of control centers or the like via appropriate communication links to provide a motion picture describing what is occurring in the real world. Such connectivity may be achieved through a combination of wireless devices and infrastructure including cell phones, microwave phones, personal digital assistants (PDAs) and hand-held computers (Palm, pocket PC, etc.), satellites, and the GPS (column 10, lines 29-44).

Additionally, the system may use biometrics and a reference database to help identify individuals and provide triggers or other notification (column 17, line 59 to column 18, line 21). The system also may be implemented in connection with conventional surveillance systems. For example, in an airline application, a constant video stream from the system may be used in connection with an X-ray machine and hand-operated wands (metal detectors) to provide

monitoring and analysis of, for example, a check-in area of an airport (column 18, lines 21-36). Additionally, the streaming video may be used to provide personnel identification visually by reconciling video streaming results with facial characteristics and badge identification, and any other biometrics and behavioral information available (column 19, lines 7-17).

Piccioni describes a method and system for situation tracking and notification using alerts generated by mobile entity devices 12 (abstract). In particular, a notification system 10 usable by law enforcement officials or other agencies for rapid notification of others regarding various public safety events is provided and includes the mobile entity device 12, a plurality of public safety alerts 13, a wireless network 14, a server 16, a network 18, a client 20 and a clearing house 22. The notification system 10 is operable to provide the capability for tracking weather, crime, emergency, traffic related and other situations to the media, public, law enforcement personnel, emergency personnel and others. The notification system 10 supports the updating and creation of public safety events in response to alerts generated by the mobile entity devices 12 and the servers 16. Events then may be searched and notifications sent to interested subscribers based on profiles associated with the subscribers. Further, the notification system 10 provides the capability for controlling access to public safety events based on the type of entity or person accessing the public safety events. Software associated with the notification system 10 may be integrated with other software and hardware, or may stand alone (column 2, lines 13-31).

The mobile entity device 12 comprises one or more input and/or output devices operable to send and receive data. Specifically, the mobile entity device 12 may comprise a keyboard, a display, a scanner, a digital camera, *other digital imaging products* and an interface to the network 14 and/or 18. For example, the device 12 may comprise a PDA, handheld or other mobile computing device and may be located in a police cruiser, an emergency vehicle, carried by an individual officer or emergency personnel, or in other suitable mobile locations. The device 12 may also be located at a fixed location such as a weather bureau office. A user of the

device 12 may comprise a law enforcement officer, emergency personnel, weather personnel and other suitable personnel (column 2, lines 32-46, emphasis added).

The alerts 13 comprise information regarding occurrences and situations encountered by users of the device 12. The alerts 13 are typically generated by the law enforcement officers, emergency personnel and weather personnel using the devices 12. The alerts 13 also may be generated automatically by devices 12 in response to the configuration of devices 12 or by other entities. The alerts 13 may be generated in realtime (column 2, lines 47-59).

Claim 44, as amended, recites a security system comprising "a portable personal digital assistant (PDA) wirelessly coupled to said object recognition system and said camera, said PDA including at least one data collection device configured to acquire non-image data." The combination of Anthony et al. and Piccioni fails to describe or suggest a security system as recited in claim 44. The specification of the present application as filed supports the recitation of "non-image data." For example, as described in the specification, the PDA may include a bar code scanner (specification, page 9, lines 14-22) or a proximity card detector (specification, page 10, lines 1-6).

The system of Anthony et al. may include one or more mobile devices, such as a PDA, for communicating with controllers or control centers. This communication may include receiving streaming video or other stored information (e.g., characteristic information relating to individuals). Additionally, information from other devices, for example, an X-ray machine, hand-held wand metal detector or other surveillance/security device may be acquired simultaneously. Using this information, an operator of the mobile device may remotely monitor and analyze an area to determine if any action is needed, for example, preventative or remedial action. However, all the information is received via cameras and other devices not provided as part of the mobile device. The system of Piccioni includes mobile entity devices that are operable to send and receive information. The mobile entity devices may include a scanner, a

digital camera and *other digital imaging products*. The mobile entity devices, thus, are configured to acquire image data. The scanner is a device that acquires image data. There is simply no description or suggestion of acquiring non-image data with a data collection device using the mobile entity devices. Non-image data is communicated to the mobile entity device by the clearing house and is entered by an operator directly into the clearing house or received from other third party sources. Accordingly, the combination of Anthony et al. and Piccioni fails to describe or suggest a security system as recited in claim 44.

Claims 45-50, 53-55, 56, 57 and 59 depend from independent claim 44. When the recitations of claims 45-50, 53-55, 56, 57 and 59 are considered in combination with the recitations of claim 44, Applicants submit that dependent claims 45-50, 53-55, 56, 57 and 59 are likewise patentable over the combination of Anthony et al. and Piccioni for at least the same reasons set forth above.

Claim 65, as amended, recites a method of providing security information comprising "acquiring non-image data from a data collection device of the PDA." The combination of Anthony et al. and Piccioni fails to describe or suggest a method as recited in claim 65. As discussed in more detail above in connection with claim 44, the combination of Anthony et al. and Piccioni fails to describe or suggest acquiring non-image data from a data collection device of a PDA. Accordingly, the combination of Anthony et al. and Piccioni fails to describe or suggest a method as recited in claim 65.

Claims 66-71 and 74-76 depend from independent claim 65. When the recitations of claims 66-71 and 74-76 are considered in combination with the recitations of claim 65, Applicants submit that dependent claims 66-71 and 74-76 are likewise patentable over the combination of Anthony et al. and Piccioni for at least the same reasons set forth above.

Claim 77 recites a method of providing security information comprising "acquiring non-image data from a data collection device of the PDA." The combination of Anthony et al. and Piccioni fails to describe or suggest a method as recited in claim 77. As discussed in more detail above in connection with claim 44, the combination of Anthony et al. and Piccioni fails to describe or suggest acquiring non-image data from a data collection device of a PDA. Accordingly, the combination of Anthony et al. and Piccioni fails to describe or suggest a method as recited in claim 77.

Claims 78-82, 85 and 86 depend from independent claim 77. When the recitations of claims 78-82, 85 and 86 are considered in combination with the recitations of claim 77, Applicants submit that dependent claims 78-82, 85 and 86 are likewise patentable over the combination of Anthony et al. and Piccioni for at least the same reasons set forth above.

Claims 51, 52, 72, 73, 83 and 84 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anthony et al. (U.S. Patent 6,559,769) and Piccioni (U.S. Patent 6,842,774) in view of Swanson et al. (U.S. Patent 5,689,442). Applicants respectfully traverse the 35 U.S.C. § 103(a) rejection.

Applicants submit that even from a cursory reading of Swanson et al., this reference fails to make up for the deficiencies of the Anthony et al. and Piccioni references. Further, claims 51 and 52 depend from independent claim 44, claims 72 and 73 depend from independent claim 65 and claims 83 and 84 depend from independent claim 77. When the recitations of claims 51, 52, 72, 73, 83 and 84 are considered in combination with the recitations of the independent claims from which claims 51, 52, 72, 73, 83 and 84 depend, Applicants submit that dependent claims 51, 52, 72, 73, 83 and 84 are likewise patentable over the combination of Anthony and Piccioni in view of Swanson et al. for at least the same reasons set forth above.

Claim 58 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anthony et al. (U.S. Patent 6,559,769) and Piccioni (U.S. Patent 6,842,774) in view of Parameswaran (U.S. Patent Application Publication 2004/0214598). Applicants respectfully traverse the 35 U.S.C. § 103(a) rejection.

Applicants submit that even from a cursory reading of Parameswaran, this reference fails to make up for the deficiencies of the Anthony et al. and Piccioni references. Further, claim 58 depends from claim 44. When the recitations of claim 58 are considered in combination with the recitations of independent claim 44, Applicants submit that dependent claim 58 is likewise patentable over the combination of Anthony and Piccioni in view of Parameswaran for at least the same reasons set forth above.

Claims 60-64 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Anthony et al. (U.S. Patent 6,559,769) and Piccioni (U.S. Patent 6,842,774) in view of Yeung (U.S. Patent 6,842,652). Applicants respectfully traverse the 35 U.S.C. § 103(a) rejection.

Applicants submit that even from a cursory reading of Yeung, this reference fails to make up for the deficiencies of the Anthony et al. and Piccioni references. Further, claims 60-64 depends from claim 44. When the recitations of claim 60-64 are considered in combination with the recitations of independent claim 44, Applicants submit that dependent claims 60-64 are likewise patentable over the combination of Anthony and Piccioni in view of Yeung for at least the same reasons set forth above.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of claims 44-86 be withdrawn.

Accordingly, in view of the foregoing, it is respectfully submitted that the prior art fails to teach or suggest the claimed invention and all of the pending claims in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully

solicited. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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